tw telecom inc.
10475 Park Meadows Drive
Littleton, CO 80124
T 303 566 1000
F 303 566 1282

September 10, 2013

Via email: director@fasb.org

Technical Director
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

RE: File Reference No. 2013-270, Proposed Accounting Standards Update- Leases (Topic 842)

Dear Sir or Madam:

tw telecom inc. appreciates the opportunity to respond to the Financial Accounting Standards Board regarding the Proposed Accounting Standards Update, Leases (Topic 842) (the "Exposure Draft"). **tw telecom inc.** is a leading national provider of managed network services, specializing in Ethernet, data networking, converged, Internet Protocol based virtual private network, Internet access, voice, including voice over Internet Protocol, and network security services to enterprise organizations, including public sector entities, and carriers throughout the U.S., including their global locations. We are a publicly traded company listed on the Nasdaq Global Select Stock Market under the symbol TWTC.

We recognize that improvements have been made from the original proposal. However, overall we believe that the Exposure Draft as currently written is not operational because some elements are still overly complex and would require significant costs to comply. We have thousands of leases to which we would need to apply the proposed guidance upon finalization of a new standard. Our primary concerns are set forth below:

1) The benefits do not outweigh the costs

We do not believe that the benefits outweigh the costs. The Exposure Draft as currently written would create a significant administrative burden to apply all aspects of the proposed model to the sheer volume of leases that we have. The burden on other companies of similar or greater size is likely to equal or exceed our burden. Furthermore, the proposed model requires the use of significant estimates and judgments, reassessment of estimates and judgments each reporting period and significant and complex disclosures, further compounding the administrative burden.

With the relatively basic accounting and disclosure requirements under the existing guidance, companies are able to use less sophisticated methods such as Excel spreadsheets or Access databases to collect and calculate the data needed to meet the current accounting and disclosure requirements. Leases are oftentimes not centrally managed and the spreadsheets or databases may not contain all elements of the lease required to calculate the asset and liability balances requiring significant effort to manually review all lease agreements in order to capture the required data. We believe that many companies will need more sophisticated methods to meet the requirements of the proposed guidance that would likely result in the incurrence of significant systems and applications costs. Even with the use of these more sophisticated tools, companies would not be able to systemize the significant estimates and judgments that would be required under the Exposure Draft. Estimates and judgments require involvement of management level employees rather than staff level employees which will contribute to the high cost of compliance given the volume of leases that many companies have.

We believe that the accounting and disclosure requirements as they exist today are adequate because users of the financial statements are able to obtain the expected cash flows from leases through the existing disclosures. Under these circumstances the potential benefit of bringing the leases on the balance sheet and expanded disclosure does not justify the additional costs.

2) Measurement of assets and liabilities may not be reliably made

Measurement of assets and liabilities recognized for leases under the Exposure Draft is not operational for companies with a significant number of leases. The proposed guidance would require a significant number of estimates some of which may not be reliably made. Many of these estimates would be made for periods which extend beyond a company's long range forecast plans. The assets and liabilities recognized on the basis of such unreliable estimates would be of dubious value to the users of financial statements.

3) The proposed lease classification guidance needs further revision

We believe that our fiber assets would be classified as Type A based on the current Exposure Draft. However, the consumption pattern of economic benefits associated with fiber assets is actually more consistent with Type B classification. We encourage the FASB to consider classification of integral equipment, including fiber assets, as Type B.

4) An effective date for the Exposure Draft should be relatively long

We believe that the effective date should be relatively long to reflect the complexity and cost that implementation would require. We recently implemented the real estate lease module of one of the top ERP providers. Our experience has been that the software available for the existing lease accounting rules is immature and still requires work-arounds to account for certain typical aspects of leases. Therefore, we believe that once third party software is developed for the proposed lease accounting, it will take some time for the software to become fully operational in the accounting for all aspects of leases.

Thank you for your consideration.

Sincerely,

/s/ Jill R. Stuart
Jill R. Stuart
Senior Vice President,
Accounting and Finance and Chief Accounting Officer

/s/ Cherie L. Barrett
Cherie L. Barrett
Senior Director,
Financial Reporting & Corporate Accounting